



Wharton County Radio, Inc

Post Office Box 390 | 515 East Jackson Street
El Campo Texas 77437
Business (979) 543-3303 | Fax (979) 543-1546
www.KULPradio.com

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C.

In the Matter – Revitalization of the AM Radio Service – MB Docket No. 13-249

Wharton County Radio, Inc., owners of KULP AM, supports the FCC's Revitalization of AM Radio Service.

- As a Class D AM unlimited service, we want the opportunity to modernize our local service with a higher fidelity translator to provide greater access for local KULP programming.
- As a Class D AM unlimited service, we want the opportunity to “modify nighttime community coverage.” We want to improve our local nighttime service with a reasonable increase in our operating power so other communities in Wharton County can be served by KULP.

This year KULP will celebrate its 66th birthday. KULP was granted a license to operate on 1390kHz as a Class D AM service on February 13, 1948.

From 1948 through the present, KULP has had three owners and five general managers. Much of the current staff has been at KULP for the past twenty years. Currently KULP employs nine full- and part-time employees.

KULP is a valuable information and entertainment asset to El Campo and Wharton County, providing a full range of programming content from local news to critical weather information. KULP also broadcasts local sports, from high school football, basketball, baseball and softball, to boys and girls Little League games.

We believe we have the longest-running radio program in the United States. Since 1948, during the 8 AM hour, KULP has programmed Texas Czech Polka music. We also program Texas Country and Classic Country music. KULP community service programming is unquestioned in El Campo and Wharton County.

KULP is a Class D AM service (500 watts day/180 watts night) and we are at a competitive disadvantage with our FM sisters. We are not disadvantaged because of our programming. We are disadvantaged because we are a Class D AM service, which limits our ability to reach out and serve those who want to listen to KULP at night.

If KULP could simply increase power at night from 180 watts to 250 watts that would improve our night reception; if KULP could operate at 500 watts full time that would be a better solution for KULP.

The FCC is correct in their analysis of the problems which confront an AM radio station. **“The AM band is also subject to interference concerns not faced by other broadcast sources.” “AM stations are unable to provide service to sizeable portions of their audiences in the evening hours and still others can provide no protected nighttime service.”**





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We receive complaints from the Residents of the City of Wharton as well as other locations in Wharton County who want to listen to KULP at night but are unable to receive a quality listenable signal.

An FM translator would improve this situation. A reasonable increase in our AM nighttime power would increase our service to those areas of Wharton County who cannot receive a quality signal at this time.

We also believe the FCC is correct in their proposal to **“Open FM Translator Filing Window for AM Licensees and Permittees.”**

In 2009 we approached the owner of a dormant translator licensed to El Campo. We were told the purchase price would be \$15,000.00. This did not seem to be an unreasonable amount of money considering the positive effect it would have on the community. We chose to delay the purchase of the translator pending reorganization of the company and FCC approval. We understood the consequence of that decision. When we approached the owner again two months later, the purchase price had gone to \$65,000.00.

We do understand the workings of a “free market place” in this case; however, the “dollar speculation” of FM translators has made it impossible for KULP to find and purchase an FM translator to grow our service area. Now the translator licensed to El Campo is owned by a company who originates programming from a service that is over 140 miles away from the local community.

The FCC is correct to provide stations like KULP the opportunity to increase coverage and service with an FM translator. The FCC is also correct that these translators should **“be used solely to re-broadcast the AM signal to provide fill-in and/or nighttime service”** and that these translators **“be permanently linked to the AM primary station acquiring it.”**

An FM translator for KULP would have immediate and long lasting positive effects on the local community.

We have enclosed comments from Community Leaders that support the Federal Communications Commission’s effort to address the concerns of small market AM broadcasters such as KULP.

Warmest Regards,

Stephen Zetsche
Mike Wenglar
Owners
Wharton County Radio, Inc
KULP Radio





WHARTON COUNTY OFFICE OF EMERGENCY MANAGEMENT

315 EAST ELM STREET
WHARTON, TEXAS 77488

979.532.1123 Voice

979.531.0473 Fax

Phillip Spenrath – Wharton County Judge

Andy Kirkland – Emergency Management Coordinator
Before the Federal Communications Commission

Washington D.C. 20554

In the Matter of - MB Docket No. 13-249 - Revitalization of the AM Radio Service

COMMENTS ON RULE MAKING BY Andy Kirkland, Wharton County Emergency Management Coordinator

As Wharton County Emergency Management Coordinator I support MB Docket No. 13-249 on behalf of KULP AM

KULP is an integral part of Wharton County's Emergency Management plan, especially in the dissemination of information in the case of a hurricane. Traffic signs on official evacuation routes specifically list KULP as the primary source of emergency evacuation information.

1. OPEN FM TRANSLATOR FILING WINDOW EXCLUSIVELY FOR AM LICENSEES AND PERMITTEES

I support this proposal on behalf of KULP AM (facility ID# 3710) to be granted an FM Translator to rebroadcast primary AM Service KULP. This proposed rule change would benefit the citizens of Wharton County with consistent Day/Night "full service" programming already provided by KULP AM.

2. MODIFY NIGHTTIME COMMUNITY COVERAGE STANDARDS FOR EXISTING AM STATIONS

KULP AM serves not just El Campo but Wharton and Wharton County Texas. While other out of market radio stations (Houston, Victoria, Bay City and Edna) are heard in Wharton County KULP programs its content to Wharton County and is considered the local radio station for news and weather information. Because KULP must reduce its power at sunset KULP's ability to serve the City of Wharton and Wharton County is limited. I support a reasonable increase in power for KULP which would increase local coverage for the citizens of Wharton County.

I applaud the effort the FCC is making on behalf of AM broadcasts, especially those in small markets such as El Campo and Wharton County Texas

Sincerely,


Andy Kirkland

Wharton County Emergency Management Coordinator



January 17, 2014

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of - MB Docket No. 13-249 - Revitalization of the AM Radio Service

COMMENTS ON RULE MAKING

KULP is a local Radio Station that provides news for the local service area and has frequent local speakers such as the City Manager, Mayor and County Judge, as well as local non-profit groups promoting their fundraisers and causes. It also provides coverage of local sporting events and some local heritage specialties such as Polka and Czech music. It provides more than just the average large market radio stations for our local area and truly provides a service to the local citizens.

I support the Revitalization of the AM Radio Service – MB Docket No 13-249

1. OPEN FM TRANSLATOR FILING WINDOW EXCLUSIVELY FOR AM LICENSEES AND PERMITTEES

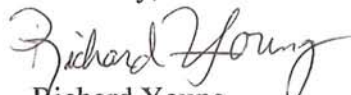
- I support this proposal on behalf of KULP AM (Facility ID #: 3710) to be granted an FM Translator to rebroadcast primary AM Service KULP. This proposed rule change would benefit the citizens of the City of El Campo Wharton County with consistent Day/Night "full service" programming already provided by KULP AM.

KULP has faithfully provided news, public affairs and weather programming to the citizens of El Campo for sixty-six years. Granting KULP an FM translator will expand their coverage and provide a higher fidelity opportunity to citizens in our area.

I applaud the effort the FCC is making on behalf of AM broadcaster's especially those in small markets such as El Campo and Wharton County Texas.

Please let me know if you have any questions that I have not addressed here.

Sincerely,


Richard Young
Mayor



January 16, 2014

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter of - MB Docket No. 13-249 - Revitalization of the AM Radio Service

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Sincerely,

Mindi Snyder
City Manager

COMMITTEES:
PENSIONS
GOVERNMENT EFFICIENCY & REFORM



TEXAS HOUSE OF REPRESENTATIVES
PHIL STEPHENSON
DISTRICT 85

January 17th, 2014

Ms. Marlene H Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20544

In the Matter of
Revitalization of the AM Radio Service
MB-Docket No. 13-249

Madam Secretary,

I would like to express my full support for the **Revitalization of the AM Radio Service act**.

Radio, in all its multitudinous formats is for all Americans (but particularly rural and small town citizens), a vital part of the community.

KULP in El Campo, which is in Wharton County, provides an invaluable service to the constituents of my house district. If enacted, The OPEN FM TRANSLATOR FILING WINDOW EXCLUSIVELY FOR AM LICENSEES AND PERMITTEES would improve this service (KULP AM) considerably.

All Americans have the fundamental right of free speech. Access to information is no different. Anything that has the potential to enhance these can only be a good thing.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Stephenson".

Texas State Representative, Phil Stephenson
House District 85 (South Fort Bend, Wharton and Jackson Counties)



PHILLIP S. SPENRATH

Wharton County Judge
309 E. Milam Street, Suite 600
Wharton, Texas 77488
Office: (979)532-4612 Fax: (979)532-1970

Joyce Ferrell
Administrative Assistant

Patty Shannon
Court Coordinator

January 16, 2014

Before the Federal Communications Commission
Washington D.C. 20554

In the Matter of - MB Docket No. 13-249 - Revitalization of the AM Radio Service

COMMENTS ON RULE MAKING BY Phillip S. Spenrath, Wharton County Judge

As Wharton County Judge, I support MB Docket No. 13-249 on behalf of KULP AM. KULP is an integral part of Wharton County's Emergency Management plan, especially in the dissemination of information in the case of a hurricane. Traffic signs on official evacuation routes specifically list KULP as the primary source of emergency evacuation information.

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I applaud the effort the FCC is making on behalf of AM broadcasts, especially those in small markets such as El Campo and Wharton County Texas.

Sincerely,

A handwritten signature in black ink, appearing to read "Phillip S. Spenrath", is written over a horizontal line.

Phillip S. Spenrath
Wharton County Judge